

**REMARKS**

By this Amendment, claim 2 is amended, and claims 24 and 25 are added.

Accordingly, claims 1-25 are pending in this application. Reconsideration is respectfully requested.

Applicants gratefully acknowledge the courtesies extended to Applicants' representative at the personal interview conducted May 13, 2004. The substance of the interview is incorporated into the following Remarks, which constitute Applicants' record of the interview.

The Office Action points out a misspelling in the title of the invention. By this Amendment, the title is amended to correctly spell "anti-aliased."

Applicants gratefully acknowledge the Office Action indication that claims 5-7 and 18-20 recite allowable subject matter. However, for the reasons set forth below, Applicants submit that all pending claims are allowable.

The Office Action rejects 1-2, 9-15 and 22-23 under 35 U.S.C. §103(a) over U.S. Patent No. 6,678,426 to Bearss et al. (hereinafter "Bearss"), in view of Applicants' alleged "admitted prior art." This rejection is respectfully traversed.

Bearss discloses a synthesizing method for converting a lower resolution pixel into a unique configuration of a plurality of higher resolution pixels. Synthesis templates are used for this conversion, each synthesis template comprising, for example, a 2x2 cell matrix representation which will represent the working pixel in the high resolution format. A synthesis template is chosen or selected, by recognizing the configuration of pixel data, adjacent to the working pixel. See column 8, lines 32-38. The synthesis templates are shown in Figs. 2A-2P of Bearss. The working pixel is replaced with data at a higher resolution, by

choosing one of the synthesis templates shown in Figs. 2A - 2P, according to the configuration of the pixels adjacent to the working pixel.

Applicants respectfully submit that Bearss does not disclose or suggest "using one or more loose templates." Applicants' specification on page 4, lines 1-9 defines a loose template as "having a plurality of image elements, wherein at least one of the image elements has a range greater than zero."

During the interview, the Examiners argued that Bearss discloses a loose template with a range of zero to one, because Figs. 2A - 2P show a template wherein a pixel 90 is either located, or not located, depending on which template is chosen. However, Applicants respectfully submit that the presence or absence of the pixel 90 corresponds to different synthesis templates shown in Figs. 2A - 2P, and not to a single loose template having at least one image element having a range of zero to one.

Applicants disagree with the Examiners' arguments that the synthesis templates of Bearss, interpreted to have values of zero or one, can reasonably be considered to correspond to a loose template wherein the image elements can have a range of values greater than zero. Even assuming, for the sake of argument, that the synthesis templates of Bearss in Figs. 2A - 2P, as apparently alleged by the Examiner, correspond to a single template which can have a value of either zero or one, each of the image elements in Bearss may have only a single value at one time, either a zero or a 1, depending on which synthesis template is chosen. Therefore, even if the synthesis templates can have of value of zero or one, they still may only have a single value at one time, and therefore there is no range of values of the image elements. There is absolutely no teaching in Bearss to support a contrary interpretation of the synthesis template.

Nowhere in Bearss is it disclosed or suggested that at least one of the image elements in a single synthesis template has a range greater than zero. In fact, using a template with image elements having a range greater than zero would render Bearss inoperable for its intended function, which is to replace a working pixel in an image with a set of pixels from a synthesis template at a higher resolution. If the image elements in the synthesis template had a range of values, it would be unclear which value to use to replace the working pixel with the higher resolution synthesis template.

Therefore, the synthesis templates of Bearss are not "loose templates," as recited in claims 1 and 14, because no ranges are associated with the cells of the matrix of the synthesis templates in Bearss. Accordingly, Bearss does not disclose "using loose templates," as recited in claims 1 and 14.

The alleged "admitted prior art" relied on by the Office Action relates only to the input of anti-aliased image data. Therefore, neither Bearss nor the alleged "admitted prior art" discloses or suggests each and every feature recited in independent claims 1 and 14. Therefore, claims 1 and 14 are patentable over Bearss.

Claims 2 and 9-13 depend from claim 1, and claims 15 and 22-23 depend from claim 14. Therefore, claims 2 and 9-13, and claims 15 and 22-23 are patentable for at least the reasons set forth above with respect to claims 1 and 14, as well as for the additional features they recite. Applicants therefore respectfully request that the rejection of claims 1-2, 9-15 and 22-23 under 35 U.S.C. §103(a) be withdrawn.

The Office Action rejects claims 3-4, 8, 16-17 and 21 under 35 U.S.C. §103(a) over Bearss in view of Applicants' alleged "admitted prior art," and further in view of U.S. Patent No. 6,463,176 to Matsugu et al. (hereinafter "Matsugu"). This rejection is respectfully traversed.

Applicants submit that Matsugu does not disclose or suggest "using one or more loose templates," and therefore does not remedy the deficiency of Bearss and the alleged "admitted prior art" with respect to independent claims 1 and 14.

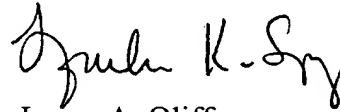
Claims 3-4 and 8 depend from claim 1, and claims 16-17 and 21 depend from claim 14. Therefore, claims 3-4, 8, 16-17 and 21 are patentable for at least the reasons set forth above with respect to claims 1 and 14, as well as for the additional features they recite. Applicants respectfully request that the rejection of claims 3-4, 8, 16-17 and 21 under 35 U.S.C. §103(a) be withdrawn.

New claims 24 and 25 recite "one or more loose-templates each having a plurality of image elements, wherein at least one image element has a range greater than one." As discussed above, neither Bearss nor Matsugu discloses these claimed features. The added claims are supported by the specification on page 4, lines 10-23, for example.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-25 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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Attachment:  
Amendment Transmittal Letter

Date: May 17, 2004

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